

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 FRANCIS G. KEOUGH, )  
 )  
 Defendant. )

CR-N-04-30032-MAP

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
JUN 29 A 8:25

MOTION TO PERMIT LATE FILING

The United States of America, by and through Michael J. Sullivan, United States Attorney for the District of Massachusetts, and William M. Welch II, Assistant United States Attorney, hereby files this motion requesting to continue the filing date of the Government's responses to three motions filed by defendant Keough by one day.

As grounds, the Government states that it had finished the motions at home on the due date, June 28, 2005, but was unable to electronically file the motions. Therefore, the motions have been filed on the morning of June 29, 2005.

Filed this 29th day of June, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

William M. Welch II / JS  
WILLIAM M. WELCH II  
Assistant United States Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts  
June 29, 2005

I, William M. Welch, Assistant U.S. Attorney, do hereby  
certify that I have served a copy of the foregoing by mailing said  
motion to:

Jack St. Clair, Esq.  
73 Chestnut Street  
Springfield, MA 01105

William M. Welch II / JS  
WILLIAM M. WELCH II  
Assistant United States Attorney